

REMARKS

Claims 1, 2, 5-14, 16, 17, 20-29, 31 and 33-44 are now pending. Claims 3, 4, 15, 18, 19, 30 and 32 have been cancelled without prejudice or disclaimer of the subject matter therein. New claims 38-44 have been added. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks herein.

Claim Rejections – 35 U.S.C. § 101

Claims 1-37 stand rejected under 35 U.S.C. § 101. This rejection is respectfully traversed.

Claims 3, 4, 15, 18, 19, 30 and 32 have been cancelled without prejudice or disclaimer. Consequently, the rejection of claims 3, 4, 15, 18, 19, 30 and 32 has been rendered moot.

Claims 1, 2 and 5-14, as amended herein, are directed toward a computer-readable medium encoded with a computer program comprising instructions that, when executed, operate to cause a computer to perform operations. Consequently, claims 1, 2 and 5-14 are directed toward statutory subject matter. Therefore, reconsideration and withdrawal of the rejection are respectfully requested.

Claim 16, as amended herein, is directed toward the statutory category of a process. More specifically, claim 16 has been amended to include the feature of storing a first workflow and a second workflow in a computer-readable storage medium, and accessing the first and second workflows from the computer-readable storage medium. Consequently claim 16, as well as claims 17 and 20-29, which ultimately depend therefrom, are tied to a statutory class. Therefore, reconsideration and withdrawal of the rejection are respectfully requested.

Claim 31, as amended herein, is directed to a system comprising a computer-readable medium encoded with a computer program comprising instructions that, when executed, operate to cause a computer to perform operations comprising. Consequently, the system of claim 31, as well as of claims 33-44, which ultimately depend therefrom, constitute a physical structure. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 1-37 stand rejected under 35 U.S.C. § 103(a) as being obvious over Schulz, “Architecting Cross-Organizational B2B Interactions” in view Basu, “A Formal Approach to Workflow Analysis.” This rejection is respectfully traversed.

At the outset, Applicants note that claims 3, 4, 15, 18, 19, 30 and 32 have been cancelled without prejudice or disclaimer. Consequently, the rejection of claims 3, 4, 15, 18, 19, 30 and 32 has been rendered moot.

Although Applicants do not concur in the Examiner’s reading of Schulz and/or Basu with respect to the claims of the instant application, each of claims 1, 16 and 31 has been amended in an effort to advance prosecution of the instant application. More specifically, each of claims 1, 16 and 31 has been amended to include the features of the first workflow including a first plurality of actual tasks, the first workflow view including a first virtual task as an abstraction of the first plurality of actual tasks, the second workflow including a second plurality of actual tasks, and the second workflow view including a second virtual task as an abstraction of the second plurality of actual tasks. Accordingly, the first workflow view, different from the second workflow view, includes a first virtual task that is an abstraction of a first plurality of actual tasks of the first workflow, and the second workflow view includes a second virtual task that is an abstraction of a second plurality of actual tasks of the second workflow.

Each of claims 1, 16 and 31 have also been amended to provide the feature of generating a third workflow view based on the second workflow and including a third virtual task as an abstraction of the second plurality of actual tasks, the third virtual task being different than the second virtual task. Accordingly, both the second workflow view and the third workflow view are based on the second workflow, and both the second virtual task and the third virtual task are abstractions of the second plurality of actual tasks, with the third virtual task being different than the second virtual task.

Each of claims 1, 16 and 31 have further been amended to provide the features of generating a first coalition workflow view referencing the first workflow view and the second workflow view to provide a first collaborative workflow, the first collaborative workflow specifying tasks that the first party and the second party are required to perform, and generating a second coalition workflow view referencing the third workflow view to provide a second

collaborative workflow view, the second collaborative workflow specifying tasks that the second party is required to perform. Accordingly, the first and second collaborative workflows have the second workflow view in common, and the first and third workflow views are not common to the second and first collaborative workflows, respectively.

As discussed in further detail herein, Schulz taken alone, or in combination with Basu, fails to disclose or render obvious at least these features of claims 1, 16 and 31.

Schulz is directed to a method of architecting cross-organizational business-to-business (B2B) interactions. More specifically, Schulz provides a B2B process model in Section 4, beginning on page 95. The B2B process model decomposes a business process into tasks, which jointly contribute to producing a desired result (Section 4.1). The B2B process model of Schulz also addresses the concept of private business processes that can be grouped into a service, which can be exposed as an interaction point within a shared, or public business process (Section 4.2). The shared, or public business process references the services of the private business processes to provide a distributed business process model, where every partner manages its own part of the overall business process (Section 4.2.1). Figure 1 of Schulz illustrates a plurality of enterprises that contribute services to a public business process. Each service corresponds to a task of the public business process.

Accordingly, Schulz describes a two-tier B2B process model, in which individual enterprises provide a service, which service fulfills a task in a public business process. In other words, each enterprise executes its own private business process to fulfill an agreed upon task within the public business process.

Schulz, however, fails to describe a three-tier process model, in which workflows (first tier) are abstracted and are provided as respective workflow views (second tier), which are in turn used to provide a plurality of collaborative workflows (third tier). In other words, Schulz fails to disclose an intermediate, abstraction tier between the respective private business processes and the public business process. Consequently, Schulz also fails to disclose a virtual task as an abstraction of a plurality of actual tasks of a workflow.

Further, Schulz fails to disclose a third workflow view that is based on the second workflow and that includes a third virtual task as an abstraction of the second plurality of actual tasks, the third virtual task being different than the second virtual task. In the B2B process

model of Schulz, each enterprise is responsible for a respective service. Schulz provides no disclosure of an enterprise being responsible for multiple services, much less two separate services that are different, and that are abstractions of a common plurality of actual services.

Finally, Schulz also fails to disclose the features of multiple collaborative workflows that have a workflow view in common, and workflow views that are not common. More specifically, Schulz discloses a single public business process that includes individual services rendered by respective enterprises. Schulz does not disclose an enterprise that renders a service that is common to multiple collaborative workflows.

Basu has been asserted as disclosing expressing tasks of workflows as vertices within a matrix. Basu has not been asserted as disclosing the above-discussed features of each of claims 1, 16 and 31, nor does Basu disclose such features. Consequently, Basu cannot cure the deficient disclosure of Schulz.

For at least the foregoing reasons, Schulz and Basu, taken either alone or in combination, fail to disclose or render obvious the features of each of claims 1, 16 and 31. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Each of claims 2, 5-14, 17, 20-29 and 33-44 ultimately depends from one of claims 1, 16 and 31, which define over the asserted references, as discussed in detail above. Consequently, each of claims 2, 5-14, 17, 20-29 and 33-44 also defines over the asserted references for at least the same

Other Claim Amendments

Claims 3, 4, 15, 18, 19, 30 and 32 have been cancelled without prejudice or disclaimer. Claims 20, 21, 24-26, 28, 29, 33, 34 and 36 have been amended in view of cancelled claims 3, 4, 15, 18, 19, 30 and 32, and/or in view of the amendments to the respective independent claims, from which each ultimately depends. New claims 38-44 have been added.

Applicant : Karsten Schulz, et al.
Serial No. : 10/628,565
Filed : July 29, 2003
Page : 15 of 15

Attorney's Docket No.: 13909-0026001 / 2002P00222
US01

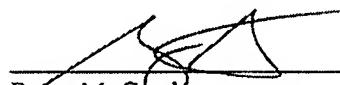
CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to amendment. Applicants respectfully request consideration of all filed IDS's not previously considered, by initialing and returning each Form 1449.

No charges are believed due. However, if any fees are due, they are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 13909-0026001.

Respectfully submitted,

Date: February 9, 2009



Ryan McCarthy
Reg. No. 50,636

Customer No. 32864
Fish & Richardson P.C.
Telephone: (512) 472-5070
Facsimile: (877) 769-7945